

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ENCOMPASS INSURANCE COMPANY OF
MASSACHUSETTS,

Plaintiff/Defendant-in-Counterclaim,

v.

JOSEPH D. GIAMPA, FREDERICK T.
GIAMPA, ADVANCED SPINE CENTERS, INC.
d/b/a FIRST SPINE REHAB, FUTURE
MANAGEMENT CORPORATION, FUTURE
MANAGEMENT BUSINESS TRUST, EDWARD
KENNEDY, BRIAN J. CULLINEY, D.C. and
JENNIFER MCCONNELL, D.C.,

Defendants.

Case No. 05-11693 RCL

REQUEST FOR HEARING

Now come the defendants Brian J. Culliney and Jennifer McConnell (together, “Defendants”) and respectfully request that this Honorable Court hear Defendants’ Emergency Motion for Protective Order on Friday, March 16, 2007 at 3:00 p.m. following the scheduled hearing on counsel’s Emergency Motion to Withdraw.

Respectfully submitted,

BRIAN J. CULLINEY and
JENNIFER MCCONNELL

By their attorney,

/s/ Thomas M. Ciampa

Thomas M. Ciampa (BBO# 566898)
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20 Park Plaza, Suite 804
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Dated: March 5, 2007

CERTIFICATE OF SERVICE

I, Thomas M. Ciampa, hereby certify that on this 5th day of March, 2007, the attached Request for Hearing was filed through the CM/ECF and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

____/s/ Thomas M. Ciampa____